

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,	)	NO. CR 18-0092-RAJ
	)	
Plaintiff,	)	
	)	DECLARATION OF JENNIFER
vs.	)	WELLMAN
	)	
BERNARD ROSS HANSEN,	)	
	)	
Defendant.	)	
	)	

Jennifer E. Wellman, being first duly sworn upon oath, states as follows:

1. I am an Assistant Federal Public Defender for the Western District of Washington. I am licensed to practice law in the State of Washington under WSBA No. 29193. I am also admitted to practice in the United States District Court for the Western District of Washington, the United States Court of Appeals, Ninth Circuit and the United States Supreme Court.
2. I am also obligated to comply with the Rules of Professional Conduct for lawyers practicing in the State of Washington which have been adopted by this Court in Local Rule 2(e)(1).
3. This office was appointed to represent Bernard Ross Hansen on April 16, 2018 (Dkt. No. 10), and I along with Assistant Federal Public Defender Dennis Carroll, are the attorneys assigned to his case.

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2 4. On September 11, 2018, I spoke with Assistant United States Attorney Brian  
3 Werner regarding the defense teams' concerns regarding public statements by the Trustee to the  
4 potential witnesses including, former employees of the Mint and alleged victims. The  
5 Government agreed that witnesses should not be misled or improperly influenced and thus,  
6 understood the concerns at the heart of the motion for an order preventing witnesses from making  
7 public statements. However, the Government did not want an order to limit either parties' means  
8 to interview and prepare witnesses for trial or make public statements to the press consistent with  
9 local rules. The defense agrees that if granted, the order should most importantly, not preclude  
10 preparation for trial by either party and drafted the proposed order narrowly with the  
11 Government's stated concerns in mind. AUSA Werner advised that, once filed, he will decide  
12 whether to oppose the motion and may be prepared to address the issue at the Status Hearing  
13 scheduled for September 21, 2018.

14 5. The factual information otherwise set forth in Defendants' Motion for an Order  
15 Preventing Witness(es) from Making Public Statements, unless otherwise noted, is based upon  
16 my direct knowledge of the case including, but not limited to the discovery produced by the  
17 government and/or knowledge derived from the records and investigation of staff members  
18 working at the Federal Public Defender's Office under my supervision on this case. By my  
19 signature below, I attest on information and belief, that, should an evidentiary hearing be held,  
20 the facts stated therein would be demonstrated.

21 I declare under penalty of perjury under the laws of the United States of America and the  
22 State of Washington, that the foregoing is true and correct.

23 Executed this 14th day of September, 2018, in Seattle, Washington.

24  
25 s/ Jennifer Wellman

Jennifer Wellman

26 Assistant Federal Public Defender